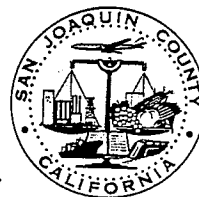


PUBLIC HEALTH SERVICES

SAN JOAQUIN COUNTY

ENVIRONMENTAL HEALTH DIVISION

Ernest M. Fujimoto, M.D., M.P.H., Acting Health Officer
304 E. Weber Ave., 3rd Floor • P. O. Box 388 • Stockton, CA 95201-0388
209/468-3420



COPY

BETSY CURNOW
PLANNING AND ASSESSMENT SECTION CHIEF
US EPA
75 HAWTHORNE STREET
SAN FRANCISCO CA 94105-3901

MAILED SEP 6 6 1995

Re: Marlowe Property
CAD001009760

East
4648 Waterloo
Stockton, CA

Dear Ms. Curnow:

San Joaquin Co.

Thank you for the copy of the "Preliminary Assessment" report dated June 2, 1995. San Joaquin County Public Health Services, Environmental Health Division (PHS/EHD) has completed review and prepared the following comments for your consideration.

The report included a description of the Marlowe Property, but failed to correctly describe the apparent problem, the regulatory involvement, the sources of contamination, and the summary. PHS/EHD hopes that the corrections shown below will provide more accurate information and that a re-evaluation of the site will occur.

Apparent Problem

In 1993 analytical results of groundwater samples collected from on site monitoring and domestic wells and from two neighboring domestic wells indicated the presence of HVOCs including 1,1 dichloroethene (1,1-DCE), Methylene Chloride, 1,2 Dichloroethane (t-1,2-DCE), 1,1 Dichloroethane (1,1-DCA), Chloroform, 1,1,1 Trichloroethane (1,1,1-TCA), Trichloroethene (TCE) and 1,2 Dichloroethene (c-1,2-DCA).

Regulatory Involvement

2.43 San Joaquin, Environmental Health Division.

In 1993, the EHD sampled the onsite domestic drinking-water well and the domestic wells at 4716 Waterloo, 4514 Waterloo, 4795 Waterloo, 2120 Wilcox, and 2817 Cherryland for TPH, BTEX, and HVOCs.

Sources of Contamination

The narrow definition of the site precluded the investigation of the operations associated with the neighboring research facility, CalCeder. Also, it should be noted that other businesses besides California Cedar Products and residences are located on Wilcox Road (Figure 202 Site Layout).

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Summary

Halogenated volatile organic compounds have been detected in both onsite and offsite domestic wells.

The population multiplier for the domestic wells in the Stockton area is 3.3 for public water systems. This multiplier value is specified in Title 22 for public water systems to estimate the monitoring requirements. The multiplier is not designed for estimation of populations in a rural area with non-community wells. The population density in this area is considerably greater than 95 people within 4 miles of the site.

PHS/EHD has made numerous attempts to get regulatory involvement at the state and federal levels. The source of the contamination has not yet been identified nor has a responsible party. Yet, the environmental hazard to nearby residents continues to exist and may be increasing. PHS/EHD considers further investigation of the site to be a priority, yet at the local level, funds are not available to proceed. PHS/EHD understands that there must be many such sites throughout the state and nation; however, reliable estimation of risk is not possible without accurate information. PHS/EHD anticipates that sufficient information should now be available for your re-evaluation.

If you have any questions or wish to discuss the site further, please contact Mary Meays at (209) 468-0337.

Donna Heran, REHS, Director
Environmental Health Division



Mary Meays, Senior REHS
Site Mitigation Unit



Diane M. Hinson, REHS
Supervisor

MM\4648.EPA

✓ cc: Wendy Cohen, Central Valley Regional Water Quality Control Board